

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

ANGELA GLODOWSKI, as Representative of
The Estate of Amanda Glodowski, Deceased,
and as Next Friend of R.G., a minor

Plaintiff,

Case No. 18-cv-151

v.

DANIEL HEKMAN, M.D., et al.

Defendants.

**DEFENDANT KRISTIN M. PAGELS' NOTICE OF MOTION AND
MOTION IN THE ALTERNATIVE TO STRIKE THE TESTIMONY OF PLAINTIFF'S
EXPERT AND BAR PLAINTIFF FROM OFFERING EVIDENCE OR TESTIMONY
FROM DR. FRED MOSS AGAINST DEFENDANT**

PLEASE TAKE NOTICE that Defendant Kristin M. Pagels, LPN, by her attorneys, Leib Knott Gaynor LLC, moves the Court pursuant to Federal Rules of Civil Procedure 26 and 37 to strike the testimony of Plaintiff's expert and bar Plaintiff from offering any evidence or testimony of Plaintiff's Monell expert, Dr. Fred Moss, against her.

This Motion is supported by the attached Brief in Support and previously filed Declaration of Douglas S. Knott (Doc. No. 131), with attached exhibits.

Respectfully submitted,

LEIB KNOTT GAYNOR LLC

Dated: February 24, 2020

By: /s/ Douglas S. Knott

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